

Eric A. Liepins
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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE	§	
	§	
DFW BOAT SPECIALISTS, LLC	§	CASE 23-40316
	§	
DEBTOR	§	

MOTION FOR SETTING AND REQUEST FOR EMERGENCY HEARING ON MOTION TO
USE CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, DFW Boat Specialists, LLC ("Debtor") and files this its Request for
Emergency Hearing on the Debtor's Motion to Use Cash Collateral.

The Debtor operates a motor vehicle dealership in the Denton Texas. As a result of certain
short terms loans which put the debtor into a cash flow crisis, the bankruptcy was filed on February
22, 2023. The Debtor seeks to use Cash Collateral to continue operations Debtor seeks an expedited
hearing on before February 28, 2023.

Respectfully submitted,

____/s/ Eric Liepins_____

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PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent via e-mail to Nextgear Capital at Jose.Sancen@coxautoinc.com, XL Funding at Valdes.Juan@axlefunding.com and mike.sweeney@usecarbucks.com and carbucks and the United States Trustee on the 23RD day of February 2023.

_____/s/ Eric Liepins_____
Eric A. Liepins

UNSWORN DECLARATION OF ERIC A. LIEPINS IN SUPPORT OF DEBTOR'S
EMERGENCY MOTION TO USE CASH COLLATERAL

1. My name is Eric A. Liepins. I submit this Declaration in support of the Debtor's Motion to Use Cash Collateral. I am over the age of 21 years and of sound mind. I have personal knowledge of all facts set forth herein, and they are true and correct.
2. I am an attorney licensed to practice in the State of Texas since 1987 and admitted in the United States District and Bankruptcy Courts for the Eastern District of Texas.
3. On February 22, 2023 I filed this bankruptcy proceeding for the Debtor.
4. The Debtor operates a motor vehicle dealership in Denton, Texas.
5. Action Credit Enterprises, LLC, Nextgear Capital, Carbucks and XL Funding (collective "Secured Creditors") may assert a lien on Debtor's accounts and inventory. ("Collateral").
6. Debtor is in need of the use of this Collateral to continue operations.

7. An emergency exists in that the Debtor will not be able to operate without the use of its accounts and inventory.

____/s/ Eric Liepins_____
Eric Liepins